



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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January 21, 2025

VIA ECF

Honorable Gary Stein
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Hafeez Saheed v. NYPD, et al.,
24 Civ. 7079 (VEC) (GS)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter.¹ The undersigned respectfully writes: (1) to respond to the Court's Valentin Order dated November 19, 2024; and (2) to provide the badge numbers and service addresses for defendants Howard Roth and Anthony Ferrer pursuant to the Court's November 19, 2024 Order. See ECF No. 6.

By way of background, plaintiff, who is proceeding *pro se*, brings this action, pursuant to 42 U.S.C. § 1983, alleging, *inter alia*, that defendants violated his constitutional rights during an incident that allegedly occurred at 215th Street and White Plains Road in the Bronx on an unspecified date. On November 19, 2024, the Court issued a Valentin Order directing the New York City Law Department to identify the third unidentified "John Doe" police officer and to

¹ This case has been assigned to Assistant Corporation Counsel Shreya Krishnamurthy, who is awaiting admission to the New York Bar. Ms. Krishnamurthy is handling this matter under my supervision and may be reached at (212) 356-2671 or shrekris@law.nyc.gov

provide the badge numbers and service addresses for defendants Howard Roth and Anthony Ferrer. See ECF No. 6.

In accordance with the Court's November 19, 2024, Order, this Office provides the full names and shield numbers for defendants Howard Roth and Anthony Ferrer:

- Lieutenant Howard Roth²
New York City Police Department
40th Precinct
567 East 149th Street
Bronx, NY 10455
- Police Officer Anthony Ferrer, Shield# 16349
New York City Police Department
1 Police Plaza
Room 110A
New York, NY 10068

Further, this Office conducted an investigation regarding the unidentified "John Doe" police officer who was allegedly involved in the events underlying plaintiff's complaint at 215th Street and White Plains Avenue in the Bronx. Based on that investigation, the undersigned respectfully submits that the incident in question occurred on May 3, 2023, and, upon information and belief, this Office identifies the following member of the New York City Police Department:³

- Police Officer Argenis Paulino, Shield# 27039
New York City Police Department
1 Police Plaza
Room 110A
New York, NY 10068

This Office thanks the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Inna Shapovalova
Inna Shapovalova
Senior Counsel
Special Federal Litigation Division

² Defendant Lieutenant Howard Roth is not currently assigned a shield number.

³ All communication with any current or former employees of the New York City Police Department, or any other City agency, except for service of process, should be made through the undersigned.

cc: **VIA FIRST-CLASS MAIL**

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